



1 GARY M. RESTAINO
 2 United States Attorney
 3 District of Arizona
 4 STUART ZANDER
 5 California State Bar No. 276724
 6 MATTHEW D. DOYLE
 7 Arizona State Bar No. 036235
 8 Assistant U.S. Attorneys
 Two Renaissance Square
 40 N. Central Ave., Suite 1800
 Phoenix, Arizona 85004
 Telephone: 602-514-7500
 Email: Stuart.Zander@usdoj.gov
 Email: Matthew.Doyle@usdoj.gov
 Attorneys for Plaintiff

SEALED

9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE DISTRICT OF ARIZONA

11 United States of America,
 12 Plaintiff,

13 vs.

14 1. Armando Daniel Delgado,
 15 2. Jessie Jenaro Paz-Aguilar,
 16 3. Izaiah Alexander Jackson,
 17 4. Daneasha Danae Phillips,
 18 5. Miah Lynae Trevino,
 19 6. Norma Angelica Rodriguez,
 20 7. Kevin Jose Garcia Meza,
 21 8. William Eden Garcia Jr.,
 22 9. Luis Angel Cabral,
 10. Emiliano Acevedo, and
 11. Cid Carlos Hernandez Jr.,

22 Defendants.

No. CR-24-00210-PHX-MTL (ESW)

INDICTMENT

VIO: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),
 (a)(1)(A)(ii), (a)(1)(B)(i)
 (Conspiracy to Transport Illegal
 Aliens for Profit)
 Count 1

THE GRAND JURY CHARGES:

BACKGROUND

25 At times relevant to this Indictment:

26 1. Snapchat is a mobile instant messaging application developed by Snap Inc.
 27 (originally Snapchat Inc.), which provides users a way to share photos, videos, geo-
 28 locations, and chats.

1 2. Snapchat is used for creating multimedia messages referred to as “Snaps.”
2 “Snaps” are photos or videos that may be shared directly with other users, or in a “Story”
3 or “Chat.” A “Story” is a collection of Snaps displayed in chronological order, while the
4 “Chat” feature allows a user to type messages and send Snaps, audio notes, and video notes
5 to other users within the Snapchat application. A post may be saved by the user and posted
6 on a later date, which is referred to as a “Memory.”

7 3. One of the principal features of Snapchat is that pictures and messages are
8 usually only available for a short time (24 hours unless removed earlier by the user) before
9 they become inaccessible to their recipients. Generally, absent changes to user settings,
10 once the content is sent and opened by the recipient, the content will be deleted from the
11 user’s device after a certain amount of time, unless the receiver opts to save the content.
12 For instance, Snapchat users are able to save photos and videos to their device or to
13 “Memories,” Snapchat’s cloud-storage service. A user can also save part of a Chat by
14 tapping on the message they want to keep.

15 4. Users can manage their privacy settings so that their Story can be viewed by
16 all Snapchat users, their friends, or a custom audience. A user can also submit their Snaps
17 to Snapchat’s “Our Story” service, which enables their Snaps to be viewed by all Snapchat
18 users in Search and the general location of the user shown on the Snap Map.

19 5. Human smuggling organizations operate to unlawfully smuggle individuals
20 into the United States from other countries, including Mexico. These aliens being
21 smuggled are not United States citizens and have not received the prior official
22 authorization from the United States government to come to, enter, or reside in the United
23 States. The aliens being smuggled, or their families, have typically paid or promised to
24 pay money, or provide other things of value, in exchange for being smuggled into the
25 United States.

26 6. Human smuggling organizations commonly utilize coordinators to recruit
27 persons to transport aliens unlawfully within the United States. The Snapchat application,
28 in conjunction with other means, has been utilized by persons associated with such human

1 smuggling organizations to coordinate, carry out, and attempt to carry out, these activities.
2 This includes users of Snapchat utilizing Story posts to recruit others to join in or carry out
3 human smuggling activities, such as by recruiting persons to pick up and transport
4 individuals who have been unlawfully smuggled into the United States and by identifying
5 locations where such smuggled individuals should be picked up or dropped off within the
6 United States.

7 **COUNT ONE**

8 7. The factual allegations in the preceding paragraphs are realleged and
9 incorporated as though full set forth herein.

10 8. Beginning on an unknown date and continuing through on or about
11 December 20, 2023, in the District of Arizona and elsewhere, defendants, ARMANDO
12 DANIEL DELGADO, JESSIE JENARO PAZ-AGUILAR, IZAIAH ALEXANDER
13 JACKSON, DANEASHA DANAE PHILLIPS, MIAH LYNNE TREVINO, NORMA
14 ANGELICA RODRIGUEZ, KEVIN JOSE GARCIA MEZA, WILLIAM EDEN GARCIA
15 JR., LUIS ANGEL CABRAL, EMILIANO ACEVEDO and CID CARLOS
16 HERNANDEZ JR., did knowingly and willfully combine, conspire, confederate, and agree
17 with persons known and unknown to the grand jury to transport and move within the United
18 States, and attempt to do the same, aliens who had come to, entered, and remained in the
19 United States in violation of law, by means of transportation and otherwise, and in
20 furtherance of such violation of law, for the purpose of commercial advantage and private
21 financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

22

23 ///

24 ///

25 ///

26

27

28

1 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and
2 1324(a)(1)(B)(i).

3 A TRUE BILL
4

5 /s/
6 FOREPERSON OF THE GRAND JURY
7 Date: February 6, 2024

8 GARY M. RESTAINO
9 United States Attorney
District of Arizona

10
11 /s/ _____
12 STUART ZANDER
MATTHEW D. DOYLE
13 Assistant U.S. Attorneys
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28